

FILED

UNITED STATES DISTRICT COURT

for the

Eastern District of Virginia

2023 OCT 24 P 2:41

Division

YASSIR ABDALLA

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

PRINCE WILLIAM COUNTY DEPARTMENT OF
TRANSPORTATION

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

1:23 CV 1447

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☐ Yes ☒ No

COMPLAINT FOR EMPLOYMENT DISCRIMINATION

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	YASSIR ABDALLA
Street Address	13458 LOCK LOOP
City and County	WOODBIDGE
State and Zip Code	VA. 22192
Telephone Number	202-9834926
E-mail Address	YASSIR14US@YAHOO.COM

Pro Se 7 (Rev. 12/16) Complaint for Employment Discrimination

Telephone Number

E-mail Address (if known)

C. Place of Employment

The address at which I sought employment or was employed by the defendant(s) is

Name

Prince William County Department of Transportation

Street Address

13458 Lock Loop

City and County

Woodbridge

State and Zip Code

VA

Telephone Number

(703) 792- 6825

II. Basis for Jurisdiction

This action is brought for discrimination in employment pursuant to (check all that apply):



Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)

Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)

Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)

Other federal law (specify the federal law):



Relevant state law (specify, if known):



Relevant city or county law (specify, if known):

- E. The facts of my case are as follows. Attach additional pages if needed.

I was interviewed for Engineer III position, I had almost 20 years of experience, almost 7 years with the same Department of Transportation in Prince William County, my interview went very well as witnessed by the Panelists.

Mr. Shammout the Assistant Director of the Department and Chief of the Division who is Palestinian national origin decided to select a Candidate same as his own national of origin (Palestinian) which was a clear discrimination based on national of origin favoritism.

The selection made was not based on qualifications or experience. The Director of the Department was notified by the EEOC and his response to the EEOC showed no investigation has been done by him to the matter and the complaint I raised.

I responded back to the the EEOC for a further investigation regarding the whole hiring process and the comments on the responses I received from the County attorney, the Department Director and Mr. Shammout (my response is available upon the Court request). I clearly explained the discrimination took place. The EEOC issued me the Right To Sue and I am practicing my right here.

(Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.)

IV. Exhaustion of Federal Administrative Remedies

- A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on (date)

11/19/2023

- B. The Equal Employment Opportunity Commission (check one):

☐

has not issued a Notice of Right to Sue letter.

☒

issued a Notice of Right to Sue letter, which I received on (date)

08/01/2023

(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)

- C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct (check one):

☐

60 days or more have elapsed.

☐

less than 60 days have elapsed.

Pro Se 7 (Rev. 12/16) Complaint for Employment Discrimination

Printed Name of Plaintiff

YASSIR ABDALLA

B. For Attorneys

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address
